

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA                   §  
   §  
V.   §          CAUSE NO. 4:18-CR-368  
   §  
SCOTT BREIMEISTER (02)                   §

**DEFENDANT'S UNOPPOSED MOTION TO MODIFY BOND**

TO UNITED STATES DISTRICT JUDGE ALFRED H. BENNETT:

Scott Breimeister, defendant, files Defendant's Unopposed Motion To Modify Bond, and would show as follows:

I.

Breimeister has been on pretrial release without incident since June of 2018. After a six-week trial in 2022, the Court declared a mistrial on December 13, 2022. As the Court continues to navigate thorny post-trial matters, Breimeister remains released under supervision. His travel is restricted to parts of Texas, Michigan, and Wisconsin.

Breimeister requests that the Court modify his conditions of release so he may travel throughout the United States without restriction and without having to trouble the Court with travel requests. Counsel has conferred with the lead prosecutor, Dan Griffin, and he does not oppose this request.

Breimeister respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/Josh Schaffer

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Attorney for Defendant  
SCOTT BREIMEISTER

**CERTIFICATE OF CONFERENCE**

I conferred with Dan Griffin, the prosecutor, on June 5, 2023, and he does not oppose this request.

/s/Josh Schaffer

Josh Schaffer

**CERTIFICATE OF SERVICE**

I served a copy of this document on all parties by electronic filing on June 5, 2023.

/s/Josh Schaffer

Josh Schaffer